



THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

ALEXANDER E. JONES

Debtor.

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Case No. 22-33553
(Chapter 7)

**DECLARATION OF PAT NEWTON IN SUPPORT OF
TRUSTEE'S APPLICATION TO EMPLOY N&N FORENSICS LLC**

I, Pat Newton, hereby submit the following statement, and do hereby state under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am familiar with the matters set forth herein and, if called as a witness, I could and would testify as follow:

2. My name is Pat Newton. I am the co-owner and partner of N&N Forensics, LLC ("**N&N**").

3. I make this Declaration is made in support of the Trustee's *Application to Employ N&N Forensics, LLC as Forensic IT Professional Nunc Pro Tunc to September 4, 2024* (the "**Application**").¹

4. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge as co-owner of N&N, information supplied to me by other N&N professionals or learned from my review of other documents. To the extent any information disclosed herein requires amendment or modification as additional information becomes available to N&N or me, a supplemental declaration will be submitted.

5. N&N is a comprehensive service provider specializing in E-Discovery and Litigation Support, boasting an extensive 25-year track record in the field and is located at 945 McKinney Street, Suite 241, Houston, Texas 77002. Our expertise encompasses consulting, data processing, IT consulting, Forensics collections, and expert witness services. We proudly serve a diverse clientele, ranging from small businesses to large corporations.

6. To the best of my knowledge, neither I nor any other professional of N&N has or represents any interest adverse to Debtor or the Estate, nor does N&N have any connections to the Debtor, the creditors, or any other party-in-interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee. To the

¹ Capitalized terms used but not otherwise defined herein are intended to have the same meaning as defined in the Application.

best of my knowledge, myself and N&N are each a “disinterested person” as that term is defined in Section 101(14) of the Bankruptcy Code.

7. N&N proposes to render various digital forensics, consulting, and IT/cyber claims services (collectively, “Services”) to the Trustee, as set forth in detail in the Application and the Engagement Letter attached thereto.

8. In connection with the Services, N&N will seek compensation on an hourly fee basis. The hourly fees will be charged as follows:

Service Type	Service Rate (\$ USD)
Digital Forensics Consulting Includes: ● ESI Collections, ● Data Analysis, & ● Report Writing	250 (Hourly)
Travel	175 (Hourly)
Expert Witness Services Includes: ● (4hr min.) Attendance for EUO, Deposition, Mediation, Trial, & ● Document Writing for Affidavit, Declaration	500 (Hourly)
Expenses	At cost

9. In addition to compensation for professional services, N&N will seek reimbursement for actual, reasonable, and necessary expenses incurred in connection with its retention. These expenses may include, but are not limited to, travel, copying, and third-party expenses.

10. N&N will submit an application for approval of the compensation of its fees and reimbursable expenses for the Services, in compliance with sections 330 and 331 of the

Bankruptcy Code, and any applicable provisions of the Bankruptcy Rules, Local Bankruptcy Rules, and/or any fee procedures and orders of the Court.

11. Neither N&N nor myself have shared or agreed to share with any person, other than with members of N&N, any compensation, except as herein set forth.

12. N&N seeks to be retained, effective September 4, 2024, the date which it first began providing services to the Trustee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: October 7, 2024

N&N FORENSICS, LLC

Pat Newton, Co-Owner & Partner
Main: 936-297-4402
Direct: 650-454-7091
Email: pnewton@nnforensics.com
945 McKinney Street, Suite 241
Houston, Texas 77002

Bankruptcy Code, and any applicable provisions of the Bankruptcy Rules, Local Bankruptcy Rules, and/or any fee procedures and orders of the Court.

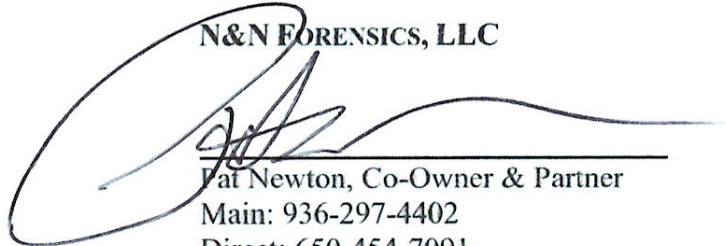
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12. N&N seeks to be retained, effective September 4, 2024, the date which it first began providing services to the Trustee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: October 7, 2024

N&N FORENSICS, LLC

A large, stylized handwritten signature in blue ink, appearing to read 'Pat Newton', is written over a horizontal line.

Pat Newton, Co-Owner & Partner

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